

Message

From: Hosid, Wayne [Wayne.Hosid@freshfromflorida.com]
Sent: 4/13/2011 8:05:48 PM
To: Loy, Cindy [caloy@dow.com]
CC: Baxter, Jim [jpbaxter@dow.com]
Subject: Curfew Cylinder label revision observations

Cindy:
FYI...in reference to our telcon-Thursday-April 21 @ 10:30 am-12:00 noon.
Regards,
Wayne

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Initial Curfew Cylinder Label Revision/Observations

1. Latest version of Curfew 24c label approved 3/15/10.
2. Latest version of Curfew cylinder label approved 3/15/10.
3. DAS requested cylinder revision to 3/15/10 label in order to bring it into alignment with other Section 3 Telone/Inline labels (uniformity purposes for DAS)
4. Changes comply with new PC&C regulations.
5. Changes were inserted from existing Telone II and 24 c Curfew label, as noted on copied labels.
6. Telone II label insertions into cylinder label were included into PPE, cautionary statements, engineering controls, storage and disposal, physical & chemical sections...see notated label.
7. Curfew label insertions into cylinder label were included into entry restrictions, notification of employees and non-employees, buffer zones sections...see notated label.
8. The term "agricultural pesticides" use in various label sections does not apply to Curfew usage...pgs. 2,3,5, label, pgs. 10, 13 booklet.
9. Question concerning end row spillage devices ...pg 4 label, pg. 11 booklet.
10. Question concerning contact with mouth ...pg.4 label, pg. 12 booklet.
11. Question in Application Rate Section: Is the statement customary to refer to state and county authorities to obtain label? According to DAS, it makes various shipment label more uniform without mis-labeling concerns.
12. Question in Warranty Section: Is.. "to the extent allowable by law" clause needed? According to DAS, that is a variable EPA decision upon their final review.
13. Previous comment under Engineering Controls concerning the use of "upstream" instead of "above" the orifice...pg. 4 label, pg. 11 booklet.
14. This was a previous CM observation: Under "Personal Protective Equipment", sections 2 and 3 it reads: "A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides – 40 CFR 170.240 (d)(5). The cab must be equipped with a vapor-

adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time.”

In cases where the enclosed cab is used in lieu of a respirator, FDACS would need to verify that the cab system meets one of the standards quoted above. For enforcement purposes, we would prefer that documentation supporting the system’s conformance with the listed standards be kept by the applicator and be made available to FDACS upon request. We recommend modifying the language on the label, by adding a documentation requirement. Ex: **A respirator is not required if the occupants are within an enclosed cab for which supporting documentation is available showing that the cab is in conformance with one of the following...**